



GVNW CONSULTING, INC.

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**VIA OVERNIGHT DELIVERY**

September 24, 2002

Ms. Marlene H. Dortch  
ATTN: CALEA 107(c)  
Secretary  
Federal Communications Commission  
9300 East Hampton Drive  
Capitol Heights, MD 20743

**Reference: CC Docket No. 97-213 and File No. NSD-L-00-234**

Dear Ms. Dortch:

Please find enclosed an original and two (2) copies of the petition for a Section 107(c) extension of CALEA Punchlist and Packet-mode capability requirements for PowerTelNet Communications, Inc., (PowerTelNet) (TRS# 822148).

Please return a stamped copy of the letter in the enclosed SASE. If there are any questions, I may be reached on (503) 612-4410.

Sincerely,

*Leslie C. Pilgrim*  
Leslie C. Pilgrim  
Senior Consultant

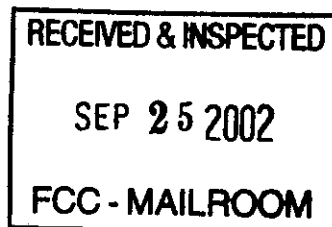
Copies to:  
CALEA Implementation Section  
14800 Conference Center Drive, Suite 300  
Chantilly, VA 20151-0450

CALEA Section 107(c) Petition  
Network Services Division  
Portals II, 445 12<sup>th</sup> Street, S.W., Room 6-A320  
Washington, D.C. 20554

No. of Copies rec'd  
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**Before the  
Federal Communications Commission  
Washington, D.C. 20554**



In the Matter of:	)	
	)	CC Docket No. 97-213
The Communications Assistance	)	PowerTelNet Communications, Inc.
For Law Enforcement Act (CALEA),	)	(499 ID # 822148)
Section 107(c) Extension of Capability	)	
Requirements	)	Wireline Competition Bureau

**PETITION FOR EXTENSION**

1. PowerTelNet Communications, Inc., hereinafter "Petitioner," respectfully submits this petition, pursuant to section 107(c) of the Communications Assistance for Law Enforcement Act (CALEA), for an extension of the section 103 capability requirements. Specifically, Petitioner requests that the Commission extend the deadline for section 103 compliance with respect to the packet-mode and "PunchList" capabilities by two years or until November 1, 2004.

2. Petitioner is a new wireline competitive local exchange carrier (CLEC), whose initial service area will include Ephrata, WA. Petitioner expects to be in service by November 1, 2002.

3. Petitioner will offer telecommunications services through soft switch technology. The "PunchList" capability upgrade for this switch is tentatively scheduled for deployment late fourth quarter of 2002. The experience with this capability is limited and Petitioner will need additional time to ensure that the capability is functional and that the technician(s) are appropriately trained.

At this time, there is not an industry standard for the packet-mode capability. Petitioner expects to upgrade the switch as the standard becomes commercially available from its manufacturer.

4. Petitioner is participating in the FBI's Flexible Deployment program. Attachment A is the company's Appendix D, Attachment B is the Appendix E (Third Edition) as submitted to the FBI. Attachment C is the FBI's email acknowledgement that data was received. Attachment D (for packet-mode) and Attachment D1 (for Punchlist) are the FBI's confirmation letters. Due to the national security nature of CALEA, Petitioner plans to work diligently to comply with the CALEA requirements.


5. Mike Bradshaw, Executive Vice-President/General Manager, 402 7<sup>th</sup> Street, Prosser, WA, 98823, telephone number (509) 786-8250, facsimile (509) 786-7615, email address [mbradshaw@bentonrea.org](mailto:mbradshaw@bentonrea.org), is authorized to discuss all CALEA related matters with the Commission. Questions related to this may also be directed to Chris Pilgrim, GVNW Consulting,

Inc., P.O. Box 2330, Tualatin, OR 97062, telephone number (503) 612-4410, facsimile (503) 612-4401, email address cpilgrim@gvnw.com.

6. This petition is signed below by an authorized agent of the petitioner, who is authorized by the carrier listed on the petition to verify the accuracy of the information provided to authorized representatives of the Federal Communications Commission or Federal Bureau of Investigation.



Leslie "Chris" Pilgrim  
Senior Consultant and  
Consultant of Record for PowerTelNet Communications, Inc.

  
Date

## APPENDIX D - FLEXIBLE DEPLOYMENT ASSISTANCE GUIDE TEMPLATE

OMB Control Number: 1110-0030  
 Expiration Date: April 30, 2003

Carrier Name **PowerTelNet Communications, Inc.**  
 TRS Number **822148**  
 Contact Person **Mike Bradshaw**  
 Address **402 7th Street**  
 City, State, Zip **Prosser, WA 98823**  
 Telephone Number **509.786.8250**  
 Fax Number **509.786.7615**

If Applicable:

Consultant of Record (COR)

COR Company Name

COR Address

COR City, State, Zip

COR Telephone Number

COR Fax Number

**Chris Pilgrim****GVNW Consulting, Inc.****8050 SW Warm Springs ST., Ste. 200****Tualatin, OR 97062****503.612.4410****503.612.4401**

Switch Deployment Information				Deployment										Information			
				Previous -1 n-2		Previous n-1		Current n		Next n+1		Next + 1 n+2					
CLLI Code or Other Unique Identifier	Component Location	Service Area(s) Served	Manufacturer & Component Platform	Generic	Date Deployed	Generic	Date Deployed	Generic	Date Deployed	Generic	Date to beDeployed	Generic	Date to beDeployed	1997	1998	1999	2000
EPHRWAAFD2	EPHRATA, WA	EPHRATA	TAQUA OCX					R. 1.6	11/02	R. 2.0	12/02			0	0	0	0

Attachment A

OMB Control Number: 1110-0030

Expiration Date: April 30, 2003

Carrier Name **PowerTelNET Communications, Inc.**

Filer 499 ID **822148**

Contact Person **Mike Bradshaw**

Address **402 7th Street**

City, State, Zip **Prosser, WA 98823**

Telephone Number **509.786.8250**

Fax Number **509.786.7615**

If Applicable:

Consultant of Record (COR)

COR Company Name

COR Address

COR City, State, Zip

COR Telephone Number

COR Fax Number

**Chris Pilgrim****GVNW Consulting, Inc.****8050 SW Warm Springs, STE 200****Tualatin, OR 97062****503.612.4410****503.612.4401**

					Deployment History										Reporting Period			
					Previous -1		Previous		Current		Next		Next + 1					
					n-2		n-1		n		n+1		n+2		Deployment History			
CLLI Code or Other Unique Identifier	Component Location		Service Area(s) Served	Manufacturer & Component Platform	Generic	Date Deployed	Generic	Date Deployed	Generic	Date Deployed	Generic	Date to be Deployed	Generic	Date to be Deployed	1998	1999	2000	2001
	City	ST																
EPHRWAAFDS2	Ephrata	WA	Ephrata	Taqua OCX					R. 1.6	11/02	R. 2.0	12/02			0	0	0	0

Please e-mail this form to FlexD@AskCALEA.net (please include "Third Edition" in subject line)

or fax to (703) 814-4750 (please include "Third Edition" on cover sheet)

**CPilgrim**

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**From:** "Flexible Deployment" <FlexD@askCALEA.net>  
**To:** "CPilgrim" <cpilgrim@GVNW.COM>  
**Cc:** "Dorrene Benthin" <dbenthin@GVNW.COM>; "Mike Bradshaw (Pwrtelnet)" <mbradshaw@bentonrea.org>  
**Sent:** Monday, September 16, 2002 10:58 AM  
**Subject:** Re: Appendixes D (2nd Edition) & E (3rd Edition) for PowerTelNet (499 ID 822148)  
Data received.

----- Original Message -----

**From:** CPilgrim  
**To:** Appendix E  
**Cc:** Dorrene Benthin ; Mike Bradshaw (Pwrtelnet)  
**Sent:** Friday, September 13, 2002 11:01 AM  
**Subject:** Appendixes D (2nd Edition) & E (3rd Edition) for PowerTelNet (499 ID 822148)

ATTN: DAWN DOHRMANN

Attached are the Appendixes D (2nd Edition) and E (3rd Edition) for PowerTelNet (499 ID # 822148). PowerTelNet is new competitive local exchange carrier (CLEC) and is scheduled to be up and working November 1, 2002.

PowerTelNet is a new CLEC offering services through a soft switch. Upon initial activation the switch will be capable of J-STD-025. The Punchlist capabilities of J-STD-026A are tentatively scheduled for installation the fourth quarter of 2002. PowerTelNet will have packet mode capability, however at this time there is not a standard for this capability. For the reasons stated herein, PowerTelNet will petition the FCC for a two year extension.

If you have any questions, please call or email me.

Chris Pilgrim  
Consultant of Record  
Tel: 503.612.4410  
Fax: 503.612.4401  
Email: [cpilgrim@gvnw.com](mailto:cpilgrim@gvnw.com)

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The Information contained in this e-mail message may be privileged, confidential and protected from disclosure. Unless you are the addressee (or authorized to receive e-mail for the addressee), you may not use, copy or disclose to anyone this message or any information contained in this message. If you think you have received this message in error, please advise the sender by return e-mail at the address specified in the message header and delete this message. Thank you.  
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**U.S. Department of Justice**

**Federal Bureau of Investigation**

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*CALEA Implementation Section  
14800 Conference Center Drive, Suite 300  
Chantilly, VA 20151*

September 17, 2002

Mike Bradshaw  
PowerTelNet  
402 7th Street  
Prosser, WA 98823

FCC TRS #822148

Dear Carrier:

The purpose of this letter is to acknowledge that the CALEA Implementation Section (CIS) received the materials submitted by PowerTelNet in response to the *Second Edition* of the Flexible Deployment Assistance Guide for packet-mode communications on 9/16/2002. These materials are currently under review. CIS will contact you, if it has any questions or concerns regarding this submission as it is being reviewed. CIS will also provide you with a written decision regarding the proposed deployment schedule.

Thank you for the submission. CIS looks forward to working with you.

Sincerely,

A handwritten signature in cursive script, reading "David Yarbrough", is positioned above the typed name.

David L. Yarbrough  
Unit Chief  
Flexible Deployment Program

cc: Chris Pilgrim  
GVNW Consulting, Inc.

**U.S. Department of Justice**

Federal Bureau of Investigation

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*CALEA Implementation Section  
14800 Conference Center Drive, Suite 300  
Chantilly, VA 20151*

September 17, 2002

Mike Bradshaw  
PowerTelNet  
402 7th Street  
Prosser, WA 98823

Filer 499 ID: 822148  
*Third Edition* Carrier ID: 5897-1245

Dear Carrier:

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Sincerely,

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David L. Yarbrough  
Unit Chief  
Flexible Deployment Program

cc: Chris Pilgrim